

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE NORTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

LATOYA SHANELLE LEWERS

11-12178-DWH

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW Trustee, Locke D. Barkley, by and through counsel, and files this Objection to Confirmation, and in support thereof states as follows:

1. Debtor¹ commenced this proceeding with the filing of a chapter 13 bankruptcy petition on May 13, 2011. Debtor filed a proposed amended plan (Dkt. #13) on July 8, 2011 (the "plan").

2. Debtor's plan fails to comply with 11 U.S.C. § 1325(a)(1). Debtor's plan proposes to retain a vehicle which has been totaled.

3. Confirmation of Debtor's plan should be denied and the case dismissed.

4. Trustee objects to any amended plan filed hereinafter.

WHEREFORE, PREMISES CONSIDERED, Trustee, Locke D. Barkley, requests that upon notice and hearing that this Court enter its order sustaining Trustee's objection and for such other relief to which Trustee and this bankruptcy estate may be entitled.

¹ The above-referenced Debtor or Debtors shall be referred to herein in the singular as Debtor unless specified otherwise.

Dated: July 19, 2011

Respectfully submitted,
LOCKE D. BARKLEY, TRUSTEE

/s/ G. Adam Sanford
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C E R T I F I C A T E

I, the undersigned attorney for Trustee, do hereby certify that I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and I hereby certify that I either mailed by United States Postal Service, first class, postage prepaid, or electronically notified through the CM/ECF system, a copy of the above and foregoing to the following attorneys of record and/or parties of interest:

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Dated: July 19, 2011

/s/ G. Adam Sanford
G. ADAM SANFORD